The potential direct, indirect, and cumulative impacts have been considered qualitatively. The duration, intensity, and type of potential impacts beyond those discussed for each resource topic in the Draft EIS have been considered. These impact criteria are defined below:

- **Duration** – whether the impact would occur in the short term (temporary) or the long term (permanent).
- **Intensity** – whether the resulting impact would be significant. Criteria for determining significance are stated in the Draft EIS; section citations are provided below as applicable.
- **Type** – whether the impact would be beneficial or adverse to the environment.

Potential impacts are also considered in the context of whether they would be limited to the immediate Project area, or a wider local or regional setting. Regions of influence described for each resource topic addressed in the Draft EIS have been considered.

3.1 PROPOSED POWERPLANT AND ASSOCIATED FACILITIES

3.1.1 Combustion Turbines and Generators

The potential impacts of the reduced particulate, CO and VOC emissions guaranteed by the turbine manufacturer, and the reduced emissions from installing an oxidation catalyst, were evaluated using dispersion modeling (Greystone 2001). A revised air quality analysis, based on these revised emission factors, predicted a reduction of the maximum air quality impacts for all pollutants except particulate matter. Annual ammonia emissions and 24-hour and one-hour emission rates from the revised increased exhaust stack heights were calculated by scaling ammonia emissions to oxides of nitrogen (NO_x) emissions using the ratio of molecular weight and concentration in the exhaust stream (Douglas 2001). Resulting impacts on air quality would not be considered significant because none of the significance criteria described in Section 3.1.2.2 of the Draft EIS (exceedance of a National Ambient Air Quality Standard [NAAQS], and Arizona Ambient Air Quality Goal [AAAQG], prevention of significant deterioration [PSD] increment, 5 percent decrease in visibility in a Class I or Class II wilderness area, or unacceptable nitrogen or sulfur deposition in an Air Quality Related Value [AQRV]) would be met.

Instead, these revisions to the Proposed Action would reduce the overall long-term adverse air quality impacts of the Project in the Big Sandy Valley, reducing the indirect adverse effects of the Project to public health, vegetation, and wildlife in the southern Big Sandy Valley.

3.1.2 Heat Recovery Steam Generators and Air Pollution Control Equipment

The addition of high efficiency drift eliminators on the cooling towers would reduce the overall long-term adverse air quality impacts of the Project in the Big Sandy Valley, produce negligible to moderate reductions in the adverse effects of the Project to public health, vegetation, and wildlife in the southern Big Sandy Valley.

Increasing the height of the proposed exhaust stacks for the heat recovery steam generators (HRSG) would adversely affect visual resources of the southern Big Sandy Valley. With a backdrop of other tall vertical structures (such as the revised height of the communication tower

described in Section 3.2.1 below), terrain, and actions to reduce impacts described in Section 2.2.8.8 of the Draft EIS, the increased height of the Phase II stacks to 165 feet would not change the visual impact rating reported for any of the key observation points in the Draft EIS. The revised height of the proposed communication tower would be approximately 160 feet (Swanson 2001), and the proposed transmission line structures described in the Draft EIS would be approximately 125 feet high. The closest resident to the proposed tower site is approximately 0.75 mile to the southwest. Visual simulations conducted for the Draft EIS indicate other tall structures associated with the proposed plant would not be visible from this residence due to existing vegetation and terrain. It is estimated that the top 15 to 25 feet of the tower would be visible from this residence. As stated in Section 2.2.8.8 of the Draft EIS, Actions to Reduce Visual Impacts, the proposed exhaust stacks would be surface-treated (dulled or painted with desert tones) to reduce visual contrast with the surrounding landscape. The increased stack height would not be considered significant because it would not meet any of the significance criteria presented in Section 3.9.2.2 of the Draft EIS (non compliance with applicable agency VRM guidelines, substantial degradation of the character or scenic quality of a landscape, or introduction of substantial dominant visual changes in the landscape that are seen by highly sensitive viewers).

3.1.3 Waste Management

3.1.3.1 Sediment Ponds

Rather than flow into the evaporation ponds, stormwater would flow into four separate sediment ponds, depicted on Figure 1. This revision to the Proposed Action would disturb an additional 3 acres of land. By separating stormwater from flows discharged to the evaporation ponds, Caithness would reduce the unlikely chance that a major storm could cause an evaporation pond to fail or overtop. Since the sediment ponds would function as infiltration basins, this revision creates a small potential for long-term adverse impacts to groundwater quality. However, there would be no significant impacts because the applicable significance criterion presented in Section 3.4.2.2 of the Draft EIS (discharge of pollutants to the vadose zone would not result in substantial degradation of the groundwater) would be met.

3.1.3.2 Evaporation Ponds

The number of evaporation ponds has increased from two to three (see Figure 1). However, since stormwater would no longer flow into them, the total surface area has decreased from 18 to 9 acres, and the total permanent ground disturbance has decreased from 18 to 13 acres. This has reduced the impacts due to ground disturbance, as described below in Section 3.1.6, Area of Ground Disturbance. In addition, as described in the section above, preventing stormwater from flowing to the evaporation ponds would reduce the unlikely chance that a major storm event could cause an evaporation pond to fail or overtop.

As discussed in Section 3.13.2.5 of the Draft EIS, evaporation ponds could provide a place where transient, migratory, or wintering water birds could rest and feed. Because the proposed evaporation ponds were adjacent to the existing Mead-Phoenix Project and Mead-Liberty Project transmission lines, birds flying towards the evaporation ponds could strike the existing transmission lines, resulting in mortality or injury to birds. One of the three ponds is now

located at the east end of the proposed plant site, away from the existing transmission lines. The reduced surface area and the revised configuration reduce the potential for birds to strike these transmission lines.

While leak detection would still be provided, Caithness has revised the pond design to include a double HDPE liner instead of the single HDPE liner and one clay liner as described in the Draft EIS. Although this revision would need to be authorized by the state of Arizona, it would likely not change the potential impacts described in the Draft EIS.

3.1.4 Emergency Access Road

The emergency access road will permanently disturb an additional 6 acres (Koblitz 2001d) of the relatively common Sonoran desertscrub vegetation, and would not result in any physical barrier to the movement of animals because it would have very little traffic. Therefore, there would be no significant impact to vegetation or wildlife because it would meet none of the applicable significance criteria presented in Sections 3.11.2.2 and 3.13.2.2 of the Draft EIS (unmitigated loss of xeroriparian vegetation or permanent, physical barriers within animal movement corridors). Since this road would not be paved, there would likely be a small increase in fugitive dust emissions from the infrequent traffic; however, the net decrease to overall ground disturbance from the revisions to the Proposed Action discussed below in Section 3.1.6 would result in an overall decrease in fugitive dust emissions.

Site AZ M:6:46 (ASM) is a scatter of flaked stone artifacts on a ridge at the northern end of the plant site. As a consequence of revisions to the Proposed Action by Caithness, this site would be disturbed by development of the emergency access road. Caithness proposed that the site be addressed before disturbance, in conformance with the Programmatic Agreement (PA) (Steltenpohl 2001 and Koblitz 2001c). The site evaluation was conducted under the PA (White and Rogge 2001c). Archaeological test excavations of Site AZ M:6:46 determined that although some artifacts are buried in sediments within a saddle on the ridge immediately north of the proposed plant site, most are confined to the rocky surface of the ridge. No temporally or culturally diagnostic artifacts or archaeological features have been found during site testing. The site is evaluated as lacking important historic values and therefore ineligible for the National Register (White and Rogge in preparation b). It is anticipated that ongoing Section 106 consultation will confirm this evaluation. Using the applicable significance criterion presented in Section 3.15.2.2 of the Draft EIS (unmitigated adverse impacts to National Register-eligible sites), there would be no significant impact to these cultural resources.

3.1.5 Plant Site Fence Line

The revised fence line would disturb slightly more existing Sonoran desertscrub vegetation than the previous fence line. Since the revised fence line (see Figure 1) would extend around a ridge to the north of the plant site, portions would become more visible than the previous fence. The new fence would also create a barrier to the movement of large mammals and could isolate animals from undisturbed habitat within the fence line. These would be additional long-term adverse impacts. Applying the applicable significance criterion from Section 3.13.2.2 of the Draft EIS, there would be no significant impact to wildlife because the new fence would not create any physical barrier that permanently prevents movement within the Big Sandy River, Sycamore Creek, or Carrow-Stephens Ranches ACEC movement corridors.

Per the applicable significance criteria in Section 3.11.2.2 of the Draft EIS, there would also be no significant impact to vegetation because there would be no unmitigated loss of xeroriparian vegetation. Impacts to visual resources would also not be significant based upon an assessment of the significance criteria presented in Section 3.9.2.2 of the Draft EIS (non-compliance with applicable agency VRM guidelines, substantial degradation of the character or scenic quality of a landscape, or introduction of substantial dominant visual changes in the landscape that are seen by highly sensitive viewers).

3.1.6 Area of Ground Disturbance

Changes to the Proposed Action would reduce the overall area of ground disturbance created by the Project by 96 acres. This would reduce the Project's permanent impacts to soil, Sonoran desertscrub vegetation, and associated wildlife resources. The decrease in ground disturbance would also indirectly decrease short-term adverse impacts to air quality during construction by decreasing fugitive dust emissions.

3.2 TRANSMISSION SYSTEM MODIFICATIONS

3.2.1 Communication Facilities

Increasing the height of the proposed communication tower would create an additional adverse impact to visual resources of the southern Big Sandy Valley. However, with a backdrop of other tall vertical structures (such as the proposed exhaust stacks), terrain, and actions to reduce impacts described in Section 2.2.8.8 of the Draft EIS, the increased height would not change the visual impact rating reported for any of the key observation points in the Draft EIS. The revised height of the proposed exhaust stacks for the HRSGs would be approximately 165 feet for Phase II (Douglas 2001), and the proposed transmission line structures described in the Draft EIS would be approximately 125 feet high. The closest resident to the proposed tower site is approximately 0.75 mile to the southwest. Visual simulations conducted for the Draft EIS indicate other tall structures associated with the proposed plant would not be visible from this residence due to the existing vegetation and terrain. It is estimated that the top 10 to 20 feet of the tower would be visible from this residence. Because the increased height of the communication tower would not change the visual rating from any of the key observation points, it would also not create a significant impact to visual resources.

3.3 ACCESS ROAD

The new optional proposed access road would [Note: "optional" means it is Caithness' option, not the agencies' (although the agencies can approve both, one, or the other)] eliminate the potential impacts associated with crossing Sycamore Creek described in the Draft EIS to floodplains (Section 3.6.2.5), Vegetation (Section 3.11.2.2), Waters of the United States (U.S.)

(Section 3.12.2.2), and Fisheries and Wildlife (Section 3.13.2.5). The acres of waters of the U.S. and xeroriparian vegetation have not been delineated along the route of the optional access road. Based on a review of topographic maps, it appears there would be a substantial decrease in the acres of waters of the U.S. and xeroriparian vegetation to be disturbed along the original route,

achieved largely by avoiding any new crossing of Sycamore Creek. URS Corporation completed a cultural resource survey of a 260-foot-wide corridor centered on the proposed optional alignment and found no cultural resources (Rogge 2001c).

No significant impacts to wildlife would occur from the construction and operation of the optional access road, based on an evaluation of the impacts of the optional alignment and the applicable significance criteria described in Section 3.13.2.2 of the Draft EIS. There would be no physical barrier that permanently prevents movement within the Big Sandy River, Sycamore Creek, or Carrow-Stephens Ranches ACEC movement corridors.

Because the optional access road alignment crosses essentially identical habitat as the proposed access road but avoids crossing Sycamore Creek or any other major drainage, the impacts of the optional access road on threatened and endangered species is less than the proposed access road. The significance of the impacts of the Project on threatened and endangered species or their habitats is being deferred until completion of the Biological Assessment [BA].

As described in Section 3.12.1 of the Draft EIS, Wetland #2 originates in an area of groundwater seepage at the head of a small channel that continues south off the Project property. The wetland contains areas of palustrine emergent vegetation, palustrine scrub-shrub, and broad-leaved deciduous vegetation. The northern part of the wetland has been heavily affected by grazing and trampling from cattle and burros; the western edge of the wetland has been disturbed by roads and grading, as well as trampling (Strong 2000).

As stated in Section 3.12.1.2 of the Draft EIS, the plant driveway was designed to avoid any direct impacts to Wetland #2. Caithness' revision to this driveway/access road would result in the permanent unmitigated loss of 0.159 acre of the northern area of Wetland #2, which would be filled for the access road embankment (Koblitz 2001e). The loss would be due to the revised grading south of the access road just before it enters the fenced plant site (see Figure 1, Drainage Plan Map). This would not have any impact on the area of groundwater seepage that provides the hydrologic support for the wetland, or any of the wetland south of the seepage (Koblitz 2001c). Therefore, the survival of the remaining portion of Wetland #2 is not threatened. Since this unmitigated loss is not substantial, there would be no significant impact, based on the significance criteria presented in Section 3.12.1.2 of the Draft EIS. Indirect impacts would include permanent, minor adverse impacts to grazing, wetland vegetation, and wildlife habitat; none of these indirect impacts approach the applicable levels of significance described in the Draft EIS.

DOE's regulations for Compliance with Floodplain-Wetlands Environmental Review Requirements (10 CFR 1022) require Western to avoid impacts to wetlands to the extent possible and consider practical alternatives to the Proposed Action that may avoid adverse effects. Western is also required to address measures that mitigate adverse effects, including minimum grading requirements and design and construction constraints. To minimize impacts, Caithness has committed to the standard erosion and sedimentation control measures described in Section 2.2.8.2 of the Draft EIS and the Stormwater Pollution Prevention Plan appended to the Draft EIS. Caithness considered building a retaining wall along the southern edge of the access road north of Wetland #2 to avoid most of the direct impact to the wetland; however, this was not practical due to the increased cost.

3.4 NATURAL GAS SUPPLY PIPELINE

3.4.1 Route Modification

This revised proposed route is the same as that described as Alternative T in the Draft EIS. Potential environmental impacts are thoroughly presented in Section 3 of the Draft EIS and a comparison of the impacts from the proposed and revised routes can be found in Table S-1 in the summary of the Draft EIS. See Figure 2, Proposed and Alternative Natural Gas Pipeline Corridors, for the location of the revised gas pipeline route. This revision would create no additional impacts not already been identified and described in the Draft EIS.

3.4.2 Expansion of Gas Pipeline Corridor Segments

The revised widths of natural gas pipeline corridor segments T1, T2, and T5 do not, by themselves, create any additional adverse impacts to the environment. There is some potential that by widening the corridors, Caithness may be better able to avoid sensitive resources (such as Arizona cliffrose) to be identified during preconstruction surveys or areas of steep slopes and erodible soils during selection of the final alignment. This potentially could reduce some short- or long-term adverse impacts to the environment.

3.5 AGRICULTURAL DEVELOPMENT

Eliminating agricultural development from the Proposed Action would reduce the maximum potential use of groundwater by 650-acre-feet per year. The potential for impacts to the southwestern willow flycatcher would be reduced because enhanced foraging habitat (agricultural development) for brown-headed cowbirds, a brood parasite, would be eliminated. Approximately 107 areas of Sonoran desertscrub and wildlife habitat would no longer be disturbed. In addition, none of the pesticides, herbicides, and other chemicals listed in Table 2-4 of the Draft EIS would be used. This revision to the Proposed Action would reduce the long-term adverse impacts of the Project to groundwater, vegetation, wildlife, and the southwestern willow flycatcher.

Eliminating agricultural development from the Proposed Action would also reduce the long-term socioeconomic benefits of the Proposed Action to the Big Sandy Valley because the local jobs, wages, and income from the sale of food products that would have resulted from this agricultural development would not occur (see Section 3.16.2.5 of the Draft EIS).

This revision also reduces the conformance of the Proposed Action with one of the purposes and some of the needs for the Proposed Action. As stated in Section 1.4.2 of the Draft EIS, one of Caithness' needs was to "Support MCEDA's objective for economic development in the Big Sandy Valley by providing land adjacent to the proposed facility and water from the proposed powerplant for agricultural purposes," and MCEDA sought, in part, to support the agricultural community in the Big Sandy Valley. These two needs will not be met by the revised Proposed Action. Further, a portion of MCEDA's purpose, to "support agriculture [in the Big Sandy Valley] in partnership with Caithness" will not be served by the revised Proposed Action.

3.6 ACTIONS TO REDUCE OR PREVENT ENVIRONMENTAL IMPACTS

3.6.1 Groundwater Monitoring, and Flow Augmentation and Monitoring

Sections 3.4.2.6 and 3.5.2.6 of the Draft EIS found that, with the implementation of actions in the Proposed Action to reduce or prevent impacts, and the mitigation measure proposed to avoid significant impacts, the pumping and consumption of groundwater as part of the Proposed Action would not result in significant impacts to the surface water flow in the Big Sandy River or to groundwater resources. The requirements for hydrologic monitoring and flow augmentation presented in the Easement go further than these same requirements contained in the Draft EIS, and therefore, together with the refined requirements from the Draft EIS for monitoring data review and analysis; conceptual and numerical model review and potential revision; and augmentation of the flow water in the Big Sandy River, are even more likely to ensure that there are no significant impact to these resources. Construction or placement of the piezometers, gauging station, and water pipeline would potentially cause short-term adverse impacts to soils, surface water quality, and wildlife during installation due to erosion, sedimentation, fugitive dust, and noise. However, these impacts would be well below significance criteria presented in the Draft EIS.

In addition, implementing the Easement's requirements for the transfer of a conservation easement to the AGFD, eliminating irrigation from the river (or groundwater) at the Banegas Ranch, and transferring all its water rights to the ADGF, as described above in Section 2.6.1 would create long-term beneficial effects to the population of endangered southwestern willow flycatchers along the Big Sandy River in the southern Big Sandy Valley. These actions would also create the potential for long-term benefits to riparian vegetation and fish and wildlife in the conservation easement and the Big Sandy River area known as the "marsh," as well as lesser long-term beneficial effects to recreation (hiking, bird watching, and fishing) and visual resources in these areas.

3.6.2 Actions to Compensate for Predicted Impacts on Cofer Hot Spring

Cofer Hot Spring is the primary source of potable water for Cholla Canyon Ranch and supports grazing, agriculture, recreational fishing in two ponds, wetlands, and a grove of 5,000 palm trees, all on private property (Adams 2001). The spring is also the recorded "base" water for the livestock that graze public lands in the Hot Springs Allotment. Aquifer testing and numerical groundwater modeling have shown that the discharge from Cofer Hot Spring would be reduced, and possibly eliminated, as a result of proposed groundwater withdrawal associated with the Project. The numeric groundwater model also predicts that as much as 130 years may be required for the deep aquifer reservoir to recover to within 90 percent of current static conditions (see Sections 3.4.2.3, 3.4.2.5, and 3.5.2.5 of the Draft EIS).

Section 3.4.2.5 of the Draft EIS found that the probable reduction or elimination of flow from Cofer Hot Spring as a result of the Project would be a significant residual impact of the Proposed Action on groundwater resources. Section 3.1.12.2 of the Draft EIS also found that the likely reduction in the size of wetland #3 (Cofer Hot Spring) as a result of the reduction or elimination of the flow from Cofer Hot Spring from the Project would be a significant residual impact of the Proposed Action to wetland resources. However, because of the agreement between Caithness and the landowner to compensate the landowner for the flow reduction and provide alternative

source(s) of water for grazing, Section 3.8.2.5 of the Draft EIS found that there would be no significant impacts to grazing resources, and Section 3.5.2.5 of the Draft EIS found that there would be no significant impacts to the land owner's surface water rights.

While an agreement between Caithness and the owner of the spring to reduce the loss of the spring flows may still be reached, this analysis takes into account the fact that no agreement currently exists. The lack of an agreement to mitigate the reduction in flow of the spring for the benefit of the landowner would create the following new, significant, residual impacts of the Proposed Action not disclosed in the Draft EIS as significant:

- The existing water available for livestock on private lands (Cholla Canyon Ranch) and public lands (Hot Springs Allotment) would be reduced, and not compensated for, which would also reduce livestock productivity on land or grazing rights not owned by Caithness, which would also not be mitigated or compensated for. These would each be a long-term, significant, adverse impact to grazing per the significance criteria presented in Section 3.8.2.2 of the Draft EIS.
- The Project would now result in an uncompensated impact to the spring owner's existing water right to the flow of Cofer Hot Spring. Under the significance criteria in Section 3.5.2.2 of the Draft EIS, this impact would be significant.

The following adverse impacts, each judged to be less than significant under the applicable significance criteria, would also result from the lack of an agreement with the owner of Cofer Hot Spring to mitigate the reduction in flow of the spring from the Project:

- The palm plantation and recreational uses (fishing) supported by the spring would be adversely impacted. The marketability and fair market value of the Cholla Canyon Ranch would likely be substantially reduced, creating a long-term adverse impact to the socioeconomics (quality of life) of the Ranch. However, under the significance criteria presented in Section 3.16.2.2 of the Draft EIS, these impacts would not be significant.
- Eliminating ponds, wetlands, and associated vegetation would create long-term, indirect, adverse impact to wildlife. However, these impacts would also not be significant, as judged under the significance criteria presented in Section 3.13.2.2.
- Eliminating wetlands, ponds, associated vegetation, and palm trees would also create an indirect long-term adverse impact to visual resources, but this impact would not be significant, per an evaluation of the impacts and the significance criteria provided in Section 3.9.2.2 of the Draft EIS.

3.7 NEW INFORMATION

This section presents a summary of potential environmental impacts regarding new information which has become known to BLM and Western since the Draft EIS was issued in June 2001.

3.7.1 Cultural Resources at Proposed Plant Site

Site AZ M:6:55 (ASM) is a scatter of fewer than 50 flaked-stone artifacts with a circle cleared of rocks. The site would be affected by construction of the emergency access road into the plant site. The assemblage has no temporally or culturally diagnostic artifacts, and the rocky substrate

indicates there is essentially no potential for buried artifacts or archaeological features. The site is evaluated to lack important historic values and is therefore ineligible for the National Register (White and Rogge in preparation b). Documentation of these findings and Section 106 consultations regarding these two sites are ongoing in accordance with the PA executed by Western, BLM, and SHPO (2001).

3.7.2 Additional Traditional Cultural Properties

The Hualapai Nation has recently identified two TCPs of particular concern within the traditional cultural landscape identified in the Draft EIS. One TCP is the cemetery located about 1.75 miles from the proposed plant site (Rogge et al 2001). Western, BLM, and URS cultural resource specialists and a representative of the Hualapai Nation examined this TCP. The cemetery is well beyond the areas that would be disturbed by construction, and no direct or indirect impacts to the cemetery are expected.

The other TCP of special concern is Cofer Hot Spring itself. The Draft EIS explained that Hualapai Nation members consider the Big Sandy Valley an integral part of their aboriginal territory and consider it a traditional cultural landscape. The Draft EIS found that the impacts of the Project on this traditional cultural landscape would be significant under the criteria set forth in Section 3.15.2.2 of the Draft EIS. As discussed above in Section 3.6.2, the Draft EIS also documents that the discharge from Cofer Hot Spring would be reduced, and possibly eliminated, by proposed groundwater withdrawal associated with the Project. The Hualapai Department of Cultural Resources has now indicated that the reduced spring flows would be an adverse effect on this significant traditional Hualapai cultural resource. Western and BLM have concluded, in consultation with the SHPO and the ACHP, that Cofer Hot Spring is eligible for the National Register of Historic Places under Criterion A. Because the Hualapai Nation considers the spring a traditional cultural resource and the spring is a National Register-eligible property to which Project impacts cannot be satisfactorily mitigated, long-term, significant, adverse impacts to this specific cultural resource would also occur, per criteria in Section 3.15.2.2 of the Draft EIS.

The Draft EIS identified two measures to mitigate impacts on the traditional Hualapai cultural landscape and archaeological sites culturally affiliated with the Hualapai Nation. One mitigation measure was financial support for the Hualapai Nation to participate in the ongoing Salt Song Project, which is being coordinated by the American Indian Studies Program at the University of Arizona. The Salt Song Project focuses on identifying the few individuals who still know and sing the Salt Songs. These songs describe the spiritual landscape of the Hualapai and neighboring tribes. The Salt Song Project seeks to document traditional knowledge about the songs before they disappear. The second measure was to train construction crews about environmental commitments and the need to minimize disturbance and avoid impacts to cultural resources adjacent to construction areas. The Draft EIS acknowledged that even with implementation of these mitigation measures, residual impacts to cultural resources would be significant.

Additional mitigation measures have been discussed and evaluated by the Hualapai Nation. The Hualapai would not consider pumping groundwater to replace the flow of Cofer Hot Spring as completely satisfactory mitigation for the lost flow, even if the water comes from the same underground source as the current spring flows (Rogge 2001a). Financial support for the Hualapai Nation to conduct additional ethnographic investigations to document the TCPs in the

Big Sandy Valley has also been proposed. Finally, Caithness has proposed to organize and financially support a community oversight board to review any citizen concerns and complaints, and the Hualapai Nation would be represented on the board to address any long-term direct or indirect impacts on the traditional Hualapai cultural landscape (Rogge 2001a).

No agreement on the level of effort and funding for these mitigation measures has been reached, and the Hualapai Nation has stated that it considers the proposed level of funding to be inadequate (Rogge 2001b).

In compliance with the Section 106 PA, Western and BLM have the responsibility to pursue appropriate mitigation measures for this significant impact. Per the significance criteria presented in Section 3.15.2.2 of the Draft EIS, adverse impacts on traditional cultural resources or National Register-eligible properties that cannot be satisfactorily mitigated are significant.